



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/EJD
F. #2021R00184

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 1, 2022

Paul Goldberger, Esq.
Goldberger & Dubin, P.C.
401 Broadway, Suite 306
New York, NY 10013

By ECF and Email

Re: United States v. Fan "Frank" Liu
Criminal Docket No. 22-311 (LDH)

Dear Mr. Goldberger:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

I. The Government's Discovery

A. Files Found on the Defendant's iPhone 12 pro with serial number F17F719R0D85

The following material is being produced as sensitive discovery material pursuant to the protective order endorsed by the Court on September 12, 2022. See ECF No. 51. Please note that all translations produced are subject to change.

Please find enclosed information found on the Defendant's iPhone 12 pro with serial number F17F719R0D85 (LIU0000002).

- Translation of a recording dated on or about February 11, 2022, Bates-Stamped **LIU_SDM_000001-LIU_SDM_000073**
- Translation of a recording dated on or about February 01, 2022, Bates-Stamped **LIU_SDM_000074-LIU_SDM_000107**
- Translation of a document, Bates-Stamped **LIU_SDM_000108-LIU_SDM_000115**

- Untranslated document, Bates-Stamped **LIU_SDM_000116-LIU_SDM_000120**
- Recording dated on or about February 11, 2022, Bates-Stamped **LIU_SDM_000121**. The translation of this recording is Bates Stamped **LIU_SDM_000001-LIU_SDM_000073**.
- Recording dated on or about February 1, 2022, Bates-Stamped **LIU_SDM_000122**. The translation of this recording is Bates-Stamped **LIU_SDM_000074-LIU_SDM_000107**.

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling me to arrange a mutually convenient time.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
Alexander A. Solomon
Emily J. Dean
Assistant United States Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (LDH) (by ECF) (without enclosures)